REMARKS

By this Amendment, Applicants amend claims 1, 3, 4, 7, 9, 11, 12, and 15, and cancel claims 2, 6, 8, 10, 14, and 16, without prejudice or disclaimer of the subject matter thereof. Claims 1, 3-5, 7, 9, 11-13, and 15 remain currently pending.

In the Office Action, the Examiner indicated that claims 4, 5, 12, and 13 would be allowable if amended to overcome rejections under 35 U.S.C. § 112, second paragraph. The Examiner objected to claims 1, 6, and 14 because of informalities; rejected claims 1-7, 10-15, and 16 under 35 U.S.C. § 112, second paragraph, as being indefinite; rejected claims 1, 2, 6, 9, 10, and 14 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,2426,696 to Yamaguchi et al. ("Yamaguchi"); rejected claims 8 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of U.S. Patent Application Publication No. 2001/0009547 to Jinzaki et al. ("Jinzaki"); rejected claims 3 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of U.S. Patent Application Publication No. 2004/0037284 to Bergek et al. ("Bergek"); and rejected claims 7 and 15 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of U.S. Patent No. 6,512,767 to Takeda et al. ("Takeda").[1]

Applicants thank the Examiner for the indication of allowable subject matter in claims 4, 5, 12, and 13. Applicants respectfully traverse the Examiner's objection and rejections.

Regarding the claim objection

[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Applicants respectfully traverse the Examiner's objection to claims 1, 6, and 14 as containing informalities. Because claims 6 and 14 have been canceled, and claim 1 has been amended not to recite "a unique ID," the objection to claims 1, 6, and 14 is moot.[2]

Regarding the rejection under 35 U.S.C. § 112

Applicants respectfully traverse the Examiner's rejection of claims 1-7, 10-15, and 16 under 35 U.S.C. § 112, second paragraph, as being indefinite. However, to expedite the prosecution of this application, Applicants have amended claims 1 and 9 to recite "an own unique ID" and "a partner unique ID," instead of "a unique ID." Applicants have also amended claims 3 and 11 to recite "the second identification information" instead of "identification information." Accordingly, Applicants respectfully request withdrawal the Section 112 rejection of claims 1, 3-5, 7, 11-13, and 15. Because claims 2, 6, 10, 14, and 16 have been canceled, the Section 112 rejection of claims 2, 6, 10, 14, and 16 is moot.

Regarding the rejection under 35 U.S.C. § 102(b)

Applicants respectfully traverse the Examiner's rejection of claims 1, 2, 6, 9, 10, and 14 under 35 U.S.C. § 102(b) as being anticipated by Yamaguchi. In order to anticipate Applicants' claimed invention under 35 U.S.C. § 102, each and every element of the claim in issue must be found, either expressly described or under principles of inherency, in a single prior art reference. Further, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." See M.P.E.P. § 2131,

[2] Although the Examiner suggested to change "a unique ID" to "an unique ID," Applicants respectfully submit that the term "a unique ID" is proper because the word "unique" begins with a consonant sound, not a vowel sound.

quoting Richardson v. Suzuki Motor Co., 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Independent claim 1, as amended, recites a combination including, for example, "a first connection unit configured to connect with a first network; a second connection unit configured to connect with a second network different from the first network; an ID generation unit configured to generate an own unique ID of its own, which is to be allocated on the first network; . . . [and] an ID acquisition unit configured to acquire a partner unique ID of [a] partner device connected to the second network through the second connection unit." Yamaguchi fails to disclose at least these features of amended claim 1.

Yamaguchi discloses a terminal ID information transmission section 1610 for transmitting terminal ID information to the network and a terminal ID information receive section 1614 for receiving terminal ID information from the network. Further, the terminal ID information transmission section 1610 and the terminal ID information receive section 1614 make connections to a single network. See Yamaguchi, Fig. 38, and column 38, lines 14-58. Therefore, Yamaguchi's teaching of ID information transmission section 1610 and terminal ID information receive section 1614 does not constitute "a first connection unit configured to connect with a first network; [and] a second connection unit configured to connect with a second network different from the first network," as recited in amended claim 1.

The Examiner concedes that "the reference does not explicitly teach the methods of a first connection unit configured to connect with a first network, and a second connection unit configured to connect with a second network different from the first

network." (Office Action at 4.) However, the Examiner alleges that "the reference shown in Fig. 4, there are two sub-networks denoted as Cn and C4. A reference node cn periodically broadcast terminal ID information as shown in Fig. 14. In Fig. 3, The Another Terminal Identifier Memory section 116 is used for storing newly registered terminal ID from sub-network other than sub-network Cn (Fig. 4 ex. C4). Thus, the reference teaches the apparatus connecting to two different networks (see column 11, lines 60-67, and see column 12, lines 1-20)." (Office Action at 4.) Applicants respectfully disagree.

In Fig. 4, "the areas in which the terminal Cn and the terminal C4 are able to perform communication are surrounded by circles to indicate the area. That is, the terminal Cn is able to communicate with the terminals C1, C2 and C4 and cannot communicate with the terminals C5 and C8." Yamaguchi, column 11, lines 60-65, emphasis added. Therefore, Cn and C4 in Fig. 4 of Yamaguchi are used to show positions of terminals and not sub-networks as alleged by the Examiner. Further, even assuming Cn and C4 indicate the communication areas, which Applicants do not agree, different communication areas do not constitute two different networks as recited in amended claim 1. In fact, because Cn cannot communicate with terminals outside the surrounding circle, there cannot be a sub-network in that no connection can be made.

Further, the present invention recited in amended claim 1 is configured to control setting of one of the own unique ID of its own, which is to be allocated on the first network, and the partner unique ID of a partner device connected to the second network, such that the own unique ID and the partner unique ID are inconsistent. Thus, Yamaguchi's teaching of receiving terminal ID information from all terminals connected

does not constitute "an ID generation unit configured to generate an own unique ID of its own, which is to be allocated on the first network; . . . [and] an ID acquisition unit configured to acquire a partner unique ID of a partner device connected to the second network through the second connection unit," as recited in amended claim 1.

Therefore, Yamaguchi fails to disclose each and every element of amended claim 1. Yamaguchi thus cannot anticipate amended claim 1 under 35 U.S.C. § 102. Accordingly, Applicants respectfully request withdrawal of the Section 102 rejection of amended claim 1.

Further, amended independent claim 9, while of different scope, include similar recitations to those of amended claim 1. Amended claim 9 is therefore also allowable for at least the same reasons stated above with respect to amended claim 1. Applicants respectfully request withdrawal of the Section 102 rejection of amended claim 9.

Because claims 2, 6, 10, and 14 have been canceled, the Section 102 rejection of claims 2, 6, 10, and 14 is moot.

Regarding the rejections under 35 U.S.C. § 103(a)

Applicants respectfully traverse the Examiner's rejection of claims 8 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of Jinzaki. However, because claims 8 and 16 have been canceled, the Section 103 rejection of claims 8 and 16 is moot.

Applicants respectfully traverse the Examiner's rejection of claims 3 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of Bergek, because a *prima facie* case of obviousness has not been established.

In order to establish a *prima facie* case of obviousness under 35 U.S.C. § 103, three basic criteria must be met. First, the prior art reference (or references when combined) must teach or suggest all the claim elements. Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Third, there must be a reasonable expectation of success. See M.P.E.P. § 2143.

Claim 3 depends from amended claim 1, and claim 11 depends from amended claim 9. As set forth above, Yamaguchi fails to teach or suggest at least "a first connection unit configured to connect with a first network; a second connection unit configured to connect with a second network different from the first network; an ID generation unit configured to generate an own unique ID of its own, which is to be allocated on the first network; . . . [and] an ID acquisition unit configured to acquire a partner unique ID of [a] partner device connected to the second network through the second connection unit," as recited in amended claim 1 and required by claim 3; and "generating an own unique ID of its own, which is to be allocated on the first network; notifying a partner device connected to the second network different from the first network of the own unique ID of its own; [and] acquiring a partner unique ID of the partner device connected to the second network," as recited in amended claim 9 and required by claim 11.

Bergek fails to cure the deficiencies of Yamaguchi. The Examiner alleges that "Bergek et al. . . . teaches the method of a reply unit configured to return the second identification information in response to an inquiry about identification information from

the partner device connected to the first network through the first connection unit (see paragraph 0042, lines 5-9, see fig. 1, box 201." (Office Action at 9.) Applicants respectfully disagree.

In the cited section, Bergek merely teaches that "the intermediate unit 2 is serving several first units 1. The intermediate unit 2 of a preferred embodiment comprises responding means 201 for responding to requests for IP addresses from a first unit 1." Bergek, para. [0042], emphasis added. However, a mere teaching of a central terminal responding to requests for IP addresses does not constitute the above listed elements as recited in claims 1 and 9 and required by claims 3 and 11. In fact, Bergek is silent as to whether intermediate unit 2 acquires any IP address from any first unit, even when multiple first units 1 are connected.

Therefore, neither Yamaguchi nor Bergek, taken alone or in any reasonable combination, teaches or suggests all elements required by claims 3 and 11. A *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully request withdrawal of the Section 103 rejection of claims 3 and 11.

Applicants respectfully traverse the Examiner's rejection of claims 7 and 15 under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of Takeda, because a *prima facie* case of obviousness has not been established.

Claim 7 depends from amended claim 1, and claim 15 depends from amended claim 9. Takeda also fails to cure the above deficiencies of Yamaguchi. The Examiner alleges that "Takeda et al. . . . teaches the methods of a connection state change detection unit (see Fig. 6, box 602) configured to detect a change in connection state on the first network; and a connection state change notification unit (see Fig. 6, box 604)

configured to notify the partner device connected to the second network of the change in connection state detected by the connection state change detection unit (see column 7, lines 55-67, and see column 8, lines 1-2)." (Office Action at 10.)

Applicants respectfully disagree. Even assuming the Examiner's allegation is correct, which Applicants do not concede, Takeda fails to teach or suggest at least the above listed elements as recited by claims 1 and 9 and as required by claims 7 and 15. Therefore, neither Yamaguchi nor Takeda, taken alone or in any reasonable combination, teaches or suggests all elements required by claims 7 and 15. A *prima facie* case of obviousness has not been established. Accordingly, Applicants respectfully request withdrawal of the Section 103 rejection of claims 7 and 15.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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